

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS SIERRA,)	
)	
Plaintiff,)	Case No. 18 C 3029
)	
v.)	Hon. John Z. Lee,
)	District Judge
)	
REYNALDO GUEVARA, <i>et al.</i> ,)	Hon. M. David Weisman,
)	Magistrate Judge
Defendants.)	
)	JURY TRIAL DEMANDED

**PLAINTIFF’S UNOPPOSED MOTION FOR RENEWED LEAVE TO DEPOSE
INCARCERATED INDIVIDUAL**

Now comes Plaintiff, Thomas Sierra, by and through his undersigned attorneys, pursuant to Fed. R. Civ. P. 30(a)(2)(B), and respectfully moves this court for an order granting Plaintiff leave to depose Alberto Rodriguez, a witness incarcerated at FCI Forrest City Low. In support of this Motion, Plaintiff states as follows:

1. This Court has previously granted Plaintiff’s oral and written motions for leave to depose Alberto Rodriguez, an individual in federal custody. See Dkt. 90 and Dkt. 115.
2. However, Mr. Rodriguez’s previously scheduled deposition was delayed because of his request to obtain counsel.
3. The parties have now agreed to conduct the deposition on April 29, 2020.
4. A prison official at FCI Forrest City Low who handles depositions and other legal matters has indicated that he requires a new court order for the deposition of Mr. Rodriguez on the new date.

5. Plaintiff therefore renews his motion, and seeks an order from this Court granting him leave to depose Alberto Rodriguez at FCI Forrest City Low on April 29, 2020. Plaintiff will then provide the prison with notice of the court order and deposition.

6. The attached proposed order provides the information required by this federal facility, and will assist Plaintiff in efforts to schedule this necessary deposition.

Wherefore, Plaintiff Thomas Sierra seeks an order from this Court granting him leave to depose Alberto Rodriguez at FCI Forrest City Low on April 29, 2020.

Respectfully Submitted,

Thomas Sierra

By: /s/ Steve Art

Jon Loevy
Arthur Loevy
Anand Swaminathan
Steve Art
Rachel Brady
Sean Starr
John Hazinski
LOEVY & LOEVY
311 North Aberdeen Street, 3FL
Chicago, IL 60607
(312) 243-5900
steve@loevy.com

CERTIFICATE OF SERVICE

I, Steven Art, an attorney, certify that on March 5, 2020, I filed the foregoing using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Steve Art
One of Plaintiff's Attorneys